

NOTICE OF COMPLIANCE/NON-COMPLIANCE**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT****Division of Environment****Waste Management Program**

Initial Inspection: (Yes) No Follow-up Inspection: Yes (No) Complaint: Yes (No)
 Hazardous Waste: LDF() TSF() GEN(X) KG() SQ() UNV() NOT A GEN() OTHER()
 Used Oil: UOG(X) UOT() UOM() UOP() UOB()
 Solid Waste: SLF() TRS() CDL() ILF() YWC() SWP() HHW() OBS() MTP() WTM() WTP() WTR() WTT()

TO: Excel Industries, Inc. 2 / 12 / 04
 Facility Name Date
200 S. Ridge Road Hesston KS 67062 Harvey
 Address City State Zip Code County

K	S	D	0	0	7	2	3	7	2	9	0
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EPA Identification No.

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Solid Waste Permit No.

This inspection was conducted to determine compliance with the state and federal solid and/or hazardous waste statutes and regulations.

☒ Violations As Follows☐ No Violations Identified

- | Citation | Description of Violation |
|--|---|
| ① <u>KAR 28-31-4(g)(1)(A)</u> | <u>Failure to conduct weekly inspections of hazardous waste storage containers during the weeks of 3/24/03, 7/28/03, and 12/29/03.</u> |
| ② ³³ <u>KAR KSA 65-3441(a)(2)</u> | <u>Storage of hazardous waste longer than 90 days without a permit or other written approval — two 55-gallon drums (waste acetone) with accumulation start dates of 10/25/03 and 11/06/03</u> |

458258



RCRA RECORDS

☒ Other Comments/Concerns:

Documents provided: Technical Guidance documents HW 95-01 and HW 97-03.
Two copies of Hazardous waste Generator Handbook and one copy of
Kansas Statutes Annotated and Regulations.

This notice is provided to call immediate attention to those areas of non-compliance. This notice does not constitute a compliance order issued by KDHE and may not be a complete listing of all violations which may be identified as a result of this inspection. Your facility must submit in writing within 30 days of receipt of this notice a description of all corrective actions taken. Any corrective actions taken by your facility will be considered in subsequent enforcement follow-up.

Your response must be submitted to:

Steff Fackrell
 Kansas Department of Health and Environment
 South Central District Office
 Waste Management Program
 130 S. Market, Suite 6050
 Wichita, Kansas 67202-3802

If you have any questions concerning this Notice or wish to discuss your response, you may call me at (316) 337-6020 or Bureau of Waste Management in the Topeka office at (785) 296-1600.

This Notice was prepared by:

Steff Fackrell

Date 2 / 12 / 04

I, the undersigned hereby acknowledge that I have received and read this Notice.

Printed Name: LELYN PETERSSignature: Lelyn PetersTitle: FACILITIES MANAGERDate 02 / 12 / 04

**NOTICE OF COMPLIANCE/NON-COMPLIANCE
CONTINUATION PAGE**KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Waste Management ProgramTO: Excel Industries, Inc.

Facility Name

2 / 12 / 04

Date

This page is a continuation of the Notice of Compliance/Non-Compliance form.

CitationDescription of Violation

- ③ KAR 28-31-4(g)(4)/40 CFR 265.52(f) Contingency plan does not describe evacuation signals and routes.

Other Comments/Concerns:

- ① Properly label and date containers of spent fluorescent lamps (refer to KDHE Technical Guidance Document HW 95-01)
- ② Properly secure outdoor containers that have funnels (refer to KDHE Technical Guidance Document HW 97-03)
- ③ Relabel "waste oil" tank with the words "used oil."

Initials of person preparing this form: SAJDate 2 / 12 / 04Initials of person receiving this form: [Signature]Date 02 / 12 / 04

NOTICE OF COMPLIANCE/NON-COMPLIANCE**CONTINUATION PAGE**

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Division of Environment

Waste Management Program

TO: Excel Industries, Inc.

Facility Name

2 / 12 / 04

Date

This page is a continuation of the Notice of Compliance/Non-Compliance form.

CitationDescription of Violation

Other Comments/Concerns:

- (D) Recommend secondary containment or other spill control device for the safety containers of gasoline and diesel fuel.
- (E) update contingency plan to reflect new building and new process.
- (F) improve emergency equipment locations and capabilities in contingency plan.

Initials of person preparing this form: SAYDate 2 / 12 / 04Initials of person receiving this form: [Signature]Date 02 / 12 / 04



KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
BUREAU OF WASTE MANAGEMENT



COMPLIANCE INSPECTION CHECKLIST
COVER PAGE

General	<input checked="" type="checkbox"/> Routine	<input type="checkbox"/> Complaint
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EPA/ ID/Permit No. KSD 007 237 290 Time 9:30 a.m. Date January 12, 2004
Facility Name Excel Industries, Inc. District SCDO
Street 200 S. Ridge Road City Hesston, KS ZIP 67062
Mailing Address (if different than above) PO Box 7000 Hesston, KS 67062-2097
County Harvey Number of Employees 250
Phone 620-327-1211 (Mr. Peters) / Fax 620-327-2828 (Mr. Peters) e-mail lpeters@excelhustler.com
620-327-4911 (main no.) / 620-327-3123 (main no.) sales@excelhustler.com
Contact(s) Lee Peters, Facility Manager Inspector(s) Steff Fackrell
Type of Business manufacturer of industrial and commercial turf and grounds maintenance equipment
Operating Hours and days Business hours: 8 a.m. - 5 p.m. Mon - Fri
Operating hours: 6 a.m. -2:30 p.m. / 2:30 p.m. - 11 p.m. / 11 p.m. - 6: a.m.
Mon - Fri
Lat/Long Location Method: GPS Garmin III Lat/Long Location Feature: parking lot
Latitude: (like 37.57621) N 38.13639° Longitude: (like-101.57621) W 97.42638°
Has the Lat/Long been entered in the SW database? Yes ☐ No ☒

Hazardous Waste Inspection:

☒ Yes ☐ No

Generator size classification: ☐ Closed/Inactive ☐ Small Qty. Generator ☒ EPA Generator
☐ Not a Generator ☐ Kansas Generator ☐ Transporter

Other Regulated Activities: ☐ T/S/D Facility ☒ Used Oil Activities
(complete applicable checklist) ☐ Tanks ☐ Universal Waste Activities

Has the company declared any information/processes as trade secrets KSA 65-3447? NO
If yes, explain: _____

If facility is closed/inactive, or has recently moved please provide a brief description.

Used Oil Activities: ☒ Yes ☐ No

Does the facility have a total above-ground storage capacity of used oil (excluding containers less than 55-gallons) of more than 1,320 gallons? ☐ Yes ☒ No

If yes, then the facility is subject to SPCC requirements due to Used Oil activities.

Facility Used Oil Activities (Attach a checklist for each one marked):

☒ Generator ☐ Collection Center / Aggregation Point
☐ Transporter / Transfer Facility ☐ Used Oil Processor / Re-Refiner
☐ Used Oil Burner (Off-Spec Fuel) ☐ Used Oil Marketer

Attach all applicable checklists.

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

Industrial Wastes Generated

(List all solid and hazardous wastes. List hazardous wastes first)

Waste description or process	If waste is hazardous give HW ID Number	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Present disposal methods
filter press sludge	undetermined - analysis pending	not yet determined	three 55-gallon drums	N/A	to be determined
Stage 1 filter bags from alkaline cleaner	undetermined - analysis pending	not yet determined	one 55-gallon drum	N/A	to be determined
gasoline	D001 D018	40 lbs.	one 55-gallon drum	2/10/04	Systech Environmental Corporation Fredonia, KS
diesel	D001, F003	15 lbs.	none	N/A	Systech
Safety-Kleen Premium Gold solvent (4 sinks; service; maintenance, fabrication, and tooling/engineering)	D039, D040	50 gallons / 16 weeks	N/A	N/A	Safety-Kleen S. Anna Wichita, KS
Safety-Kleen solvent from one paint gun cleaner	D001, D018, D035, D038, D039, D040, F003, F005	currently not in service; last generated 36 lbs. on 11/20/03	N/A	N/A	will be through Safety-Kleen
acetone (from liquid paint operations)	D001 F003	none currently generated; last shipped 3,200 lbs. on 11/30/03	five 55-gallon drums	10/25/03	Univar Wichita, KS
paint booth filters (liquid painting)	D001, F003	none currently generated; last shipped on 11/30/03(3,200 lbs, primarily acetone)	N/A	N/A	will incinerate in onsite burn-off oven
fluorescent lamps	universal waste	25 lbs	72 4-footers, 35 8-footers	N/A	Onyx Special Services Inc. Phoenix, AZ
alkaline batteries	universal waste	40 lbs / year	4 gallons	N/A	Clean Harbors La Porte, TX

Waste description or process	If waste is hazardous give HW ID Number	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Present disposal methods
Ni-Cad batteries	universal waste	10 lbs / year	1 gallon	N/A	Clean Harbors La Porte, TX
oil	recycled	100 gallons	275 gallons	N/A	Safety-Kleen 53 rd St. North Wichita, KS
turf equipment batteries	recycled	8	9	N/A	Auto Castings Recovery Co. Newton, KS
forklift batteries	recycled	< 1	none	N/A	Allied Battery Wichita, KS
tires	recycled, reused, or discarded	2 - 4	4	N/A	Resource Management, Inc. via Harvey County Transfer Station
scrap metal	recycled	varies	three 8- X 15-foot roll-off bins	N/A	Wichita Iron & Metal Wichita, KS
cardboard boxes (baled)	recycled	varies	23 bails	N/A	Resource Control Paper Stock Dealer) Topeka, KS
coolant (saws and drill presses)	nonhazardous	150 gallons / year	none	N/A	Safety-Kleen 53 rd St. North Wichita, KS
pleated paint booth filters (powder coating)	nonhazardous	not yet determined	N/A	N/A	will be discarded in trash
bag filters (powder coat booth)	nonhazardous	not yet determined	N/A	N/A	will be discarded in trash
bag filters (liquid paint booth)	nonhazardous	process permanently discontinued that generated this waste	N/A	N/A	trash
ash from incinerated liquid paint booth filters and paint from hooks	nonhazardous SWDA # 03-0575	none generated since ~ January 10, 2004	20 55-gallon drums	N/A	WM Rolling Meadows Topeka, KS

Waste description or process	If waste is hazardous give HW ID Number	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Present disposal methods
drained oil filters	nonhazardous	5 - 25	~ 10	N/A	trash
50-50 mix antifreeze and water	nonhazardous	two 55-gallon drums / year	two 55-gallon drums	N/A	Vopak Logistics Services USA, Inc. Deer Park, TX
mud trap waste	nonhazardous	last clean-out on 11/18/02	N/A	N/A	Prewit Septic Tank Service, Fluid Systems El Dorado, KS
pallets & crates	nonhazardous	varies	two 40 cubic-yard roll-off bins	N/A	City of Hesston burn pile (after 4/1/04 waste will go to Harvey Co. Transfer Station
glass	nonhazardous	varies	1 cubic yard	N/A	Stutzman Refuse Disposal Hutchinson, KS
solid waste	nonhazardous	—	two 40 cubic-yard container capacity	N/A	Stutzman Refuse Disposal

General Requirements (GGR)

YES NO NA V#

1. Has the generator evaluated each potentially hazardous waste(s) to determine if it is hazardous? **KAR 28-31-4(b)** ☒ ☐ ☐
- a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? **KAR 28-31-4(b)(3)(A)** ☒ ☐ ☐
- b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? **KAR 28-31-4(f)(1)(C)** ☒ ☐ ☐
- c. If waste was not tested, did the generator use process knowledge? **KAR 28-31-4(b)** ☒ ☐ ☐
2. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW? ☒ ☐ ☐
Approval from KDHE BOW to discharge to sanitary sewer; NPDES permit pending; permit # P-LA07-1001
3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each subject waste? **KAR 28-29-109(c)** ☒ ☐ ☐
- a. List the SWDA authorization number(s): 03-0575
4. If the generator recycles hazardous waste on-site (such as in a still), do they count waste each time prior to its being recycled? **KAR 28-31-4(o)** ☐ ☐ ☒
If the waste is not counted, is it exempt because of a closed loop system? **KAR 28-31-4(o)** ☐ ☐ ☐

General Requirements:☒ **Compliance** ☐ **Non-Compliance** ☐ **NA****Notification Requirements (GGR)**

5. Has generator notified KDHE and obtained an EPA Identification Number? **KAR 28-31-4(c)(1)** ☒ ☐ ☐
6. Is current notification accurate? **KAR 28-31-4(c)(1)** ☒ ☐ ☐

Notification Requirements:☒ **Compliance** ☐ **Non-Compliance** ☐ **NA**

Non-Accumulating Small Quantity Generator

YES NO NA V#

7. If the SQG is accumulating less than 25 kg of hazardous waste on-site,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2)**
- b. Is the SQG sending this waste off-site for treatment, storage, or disposal? **KAR 28-31-4(m)(2)**

☐ ☐ ☐☐ ☐ ☐**Non-Accumulating SQG Requirements:**☐ Compliance ☐ Non-Compliance ☒ NA

(small quantity generator not accumulating, stop here)

Accumulating Small Quantity Generator

8. If the SQG is accumulating 25 kg or more of hazardous waste,
- a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? **KAR 28-31-4(m)(2)**
- b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? **KAR 28-31-4(m)(2)**

☐ ☐ ☐☐ ☐ ☐**Accumulating SQG Requirements:**☐ Compliance ☐ Non-Compliance ☒ NA**Pre-Transport Requirements (GPT)**

9. Does generator package, label (flammable liquid, poison, etc.), and mark (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? **KAR 28-31-4(e)**
- a. Does generator mark each container of 110 gallons or less as below? **KAR 28-31-4(e)(3)(B)**

☒ ☐☒ ☐ ☐

Hazardous Waste-Federal Law Prohibits Improper Disposal.

If found, contact the nearest police or public safety authority or the US EPA.

*Generator's Name and Address
Manifest Document Number*

10. Does generator only use a transporter who has registered with the department and obtained an EPA Identification Number? **KAR 28-31-4(c)(2)**

☒ ☐**Pre-Transport Requirements:**☒ Compliance ☐ Non-Compliance ☐ NA

Storage Requirements (GPT)

YES NO NA V#

11. If generator temporarily stores waste in containers,
- a. Is each container clearly marked with the words "Hazardous Waste"?
KAR 28-31-4(g)(3) or KAR 28-31-4(h)(4) or KAR 28-31-4(m)(2)(B) ☒ ☐
- b. Is the accumulation start date marked on each container?
KAR 28-31-4(g)(2) or KAR 28-31-4(h)(3) or KAR 28-31-4(m)(2)(B) ☒ ☐
- c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)** ☒ ☐
- d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors?
KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B) ☐ ☒
- A. If yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? **KAR 28-31-4(k)** ☒ ☐
12. If SQG or Kansas generator is accumulating 2,200 lbs (1,000 kg) or more of hazardous waste (or 2.2 lbs (1 kg) or more of acutely hazardous waste), then check yes and continue with EPA generator requirements. ☐ ☐ **NA**

Storage Requirements:

☐ Compliance ☒ Non-Compliance ☐ NA

(Small quantity generator accumulating <1,000 Kilograms stop here)

Storage Requirements for Kansas and EPA Generators (GPT)

YES NO NA V#

13. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? **KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A)** ☐ ☐ ☒
14. Is EPA generator storing hazardous waste for 90 days or less? **KSA 65-3441(a)(2)** ☐ ☒ ☐
15. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the generator's property line? (EPA Generator Only) **KAR 28-31-4(g)(1)(A)** ☒ ☐ ☐

2

(If waste(s) is placed in tanks complete the appropriate inspection checklist.)

Storage Requirements:

☐ Compliance ☒ Non-Compliance ☒ NA

Satellite Accumulation Requirements for Kansas and EPA Generators (GPT)

16. If the Kansas or EPA generator has satellite accumulation areas,
- Is 55-gallons or less of each waste stream accumulated at or near the point of generation, in one container, which is under the control of the operator of the process generating that waste? **KAR 28-31-4(j)(1)** ☐ ☐
 - Is each container in good condition and closed except to add or remove waste? **KAR 28-31-4(j)(1)(A)** ☐ ☐
 - Is each container marked with the words "Hazardous Waste"? **KAR 28-31-4(j)(1)(B)** ☐ ☐
 - Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? **KAR 28-31-4(j)(2)** ☐ ☐ ☐
 - Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? **KAR 28-31-4(j)(2)** ☐ ☐ ☐

Satellite Accumulation Requirements:

☐ Compliance ☐ Non-Compliance ☒ NA

Manifests (GMR)

YES NO NA V#

17. If a contractual agreement is used in place of manifesting? (Kansas Generators only)
 - a. Does the contractual agreement include the type of waste and frequency of shipments? **KAR 28-31-4(d)(7)(A)**

☒ ☐ ☐
 - b. Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? **KAR 28-31-4(d)(7)(B)**

☒ ☐ ☐
 - c. Is a copy of the agreement kept for a period of three years after termination of agreement? **KAR 28-31-4(d)(7)(C)**

☒ ☐ ☐

18. If required, is a hazardous waste manifest used? **KAR 28-31-4(d)(1)**

☒ ☐ ☐

 - a. If yes, does each manifest include:
 1. Generator EPA identification number (12 digit) and unique manifest document number (five digit)? **KAR 28-31-4(d)(1)**

☒ ☐
 2. Number of pages? **KAR 28-31-4(d)(1)**

☒ ☐
 3. Generator's name and mailing address? **KAR 28-31-4(d)(1)**

☒ ☐
 4. Generator's phone number? **KAR 28-31-4(d)(1)**

☒ ☐
 5. Each transporter's name? **KAR 28-31-4(d)(1)**

☒ ☐
 6. Each transporter's EPA identification number? **KAR 28-31-4(d)(1)**

☒ ☐
 7. Name and site address of designated facility? **KAR 28-31-4(d)(1)(A)**

☒ ☐
 8. Designated facility's EPA identification number? **KAR 28-31-4(d)(1)**

☒ ☐
 9. Waste description (DOT shipping name, hazard class, packing group and identification number)? **KAR 28-31-4(d)(1)**

☒ ☐
 - i. If applicable, are the requirements of 49 CFR 172.203(k) met? **KAR 28-31-4(d)(1)**

☒ ☐ ☐
 10. Number and type of containers? **KAR 28-31-4(d)(1)**

☒ ☐
 11. Total quantity? **KAR 28-31-4(d)(1)**

☒ ☐
 12. Unit (weight or volume)? **KAR 28-31-4(d)(1)**

☒ ☐
 13. Special handling instructions (if applicable)? **KAR 28-31-4(d)(1)**

☒ ☐
 14. Generator's certification including waste minimization statement, generator's signature and date? **KAR 28-31-4(d)(4)(A)**

☒ ☐
 15. Name, signature, and date of initial transporter? **KAR 28-31-4(d)(4)(B)**

☒ ☐
 - b. Does generator retain a copy of each manifest signed and dated by both generator and transporter? **KAR 28-31-4(d)(4)(B) and/or KAR 28-31-4(d)(4)(C)**

☒ ☐ ☐
 - c. Does generator retain a copy of each manifest(s) signed and dated by T/S/D facility owner/operator for three years? **KAR 28-31-4(f)(1)(A)**

☒ ☐ ☐
 - d. If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? **KAR 28-31-4(f)(4)(B)**

☐ ☐ ☒

 1. If yes, was copy retained for three years? **KAR 28-31-4(f)(1)(B)**

☐ ☐ ☒

Manifesting Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

Land Disposal Restriction Requirements (GLB)

YES NO NA V#

19. If the generator's waste is **not** subject to the Land Disposal Restrictions regulations, please explain why: _____
20. If the generator sent waste **not meeting** the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? **KAR 28-31-14/40 CFR 268.7(a)(2)** ☒ ☐ ☐
- a. Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? **KAR 28-31-14/40 CFR 268.7(a)(2)** ☒ ☐ ☐
21. If the generator sent waste **meeting** the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? **KAR 28-31-14/40 CFR 268.7(a)(3)** ☐ ☐ ☒
- a. Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? **KAR 28-31-14/40 CFR 268.7(a)(2)** ☐ ☐ ☒
22. If the generator treated waste in tanks or containers to meet applicable treatment standards:
- a. Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? **KAR 28-31-14/40 CFR 268.7(a)(5)** ☐ ☐ ☒
- b. If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? **KAR 28-31-14/40 CFR 268.7(a)(5)(iii)** ☐ ☐ ☒
23. Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site? **KAR 28-31-14/40 CFR 268.7(a)(8)** ☒ ☐ ☐
24. If the generator claims that his characteristic waste is no longer hazardous:
- a. Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files? **KAR 28-31-14/40 CFR 268.9(d)** ☐ ☐ ☒
- b. Is the information on the notice and certification current? **KAR 28-31-14/40 CFR 268.9(d)** ☐ ☐ ☒

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations in the summary.

LDR Requirements:

☒ Compliance ☐ Non-Compliance ☐ NA

Special Conditions (GSC)

YES NO NA V#

25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?

☐ ☐ ☐

If hazardous waste was shipped/received to/from a foreign source, please describe in summary.

Special Conditions Requirements:☐ Compliance ☐ Non-Compliance ☒ NA**Kansas Generator's Emergency Preparedness (GPT)**

26. Has generator designated one employee as emergency coordinator?

KAR 28-31-4(h)(6)☐ ☐

- a. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? **KAR 28-31-4(h)(6)**

☐ ☐

- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? **KAR 28-31-4(h)(9)**

☐ ☐

27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? **KAR 28-31-4(h)(7)**

- a. Name and telephone number of the emergency coordinator(s)? **KAR 28-31-4(h)(7)(A)**

☐ ☐

- b. Location of fire extinguishers and spill-control material and if available fire alarms?

KAR 28-31-4(h)(7)(B)☐ ☐

- c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? **KAR 28-31-4(h)(7)(C)**

☐ ☐

28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? **KAR 28-31-4(h)(8)**

☐ ☐**KS Gen.'s Emergency Preparedness Requirements:**☒ Compliance ☐ Non-Compliance ☒ NA**Hazardous Waste Reporting (GRR)**

29. Has Kansas or EPA generator submitted an annual monitoring fee and report to KDHE?

KAR 28-31-10(g)(1) or KAR 28-31-10(g)(3)☒ ☐

30. Has EPA generator submitted a biennial report(s) to KDHE? **KAR 28-31-4(f)(2)(A)**

☒ ☐ ☐

- a. Does generator retain a copy of the report for three years? **KAR 28-31-4(f)(1)(B)**

☒ ☐ ☐**Hazardous Waste Reporting Requirements:**☒ Compliance ☐ Non-Compliance ☐ NA

Preparedness and Prevention (GPT)
--

YES NO NA V#

- | | |
|--|---|
| <p>31. Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? KAR 28-31-4(g)(4)/40 CFR 265.31</p> | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <p>32. If appropriate, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:</p> <p>a. Internal communication or alarm system easily accessible in case of emergency? KAR 28-31-4(g)(4)/40 CFR 265.32(a)</p> <p>b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? KAR 28-31-4(g)(4)/40 CFR 265.32(b)</p> <p>c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? KAR 28-31-4(g)(4)/40 CFR 265.32(c)</p> <p>d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? KAR 28-31-4(g)(4)/40 CFR 265.32(d)</p> <p>e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? KAR 28-31-4(g)(4)/40 CFR 265.33</p> | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <p>33. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? KAR 28-31-4(g)(4)/40 CFR 265.35</p> | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <p>34. If appropriate, for the type(s) of waste handled, has the generator made the following arrangements:</p> <p>a. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? KAR 28-31-4(g)(4)/40 CFR 265.37(a)(1)</p> <p>b. Designated one authority where one or more police or fire departments might respond to an emergency? KAR 28-31-4(g)(4)/40 CFR 265.37(a)(2)</p> <p>c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? KAR 28-31-4(g)(4)/40 CFR 265.37(a)(3)</p> <p>d. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. KAR 28-31-4(g)(4)/40 CFR 265.37(a)(4)</p> | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/>
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
<input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <p>35. Do personnel have immediate access to an internal alarm or emergency communications device, either directly or through visual or contact with another employee, when handling hazardous waste (unless such a device is not required under § 265.32)? KAR 28-31-4(g)(4)/40 CFR 265.34</p> | <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> |
| <p>36. In cases where local authorities decline to enter into such arrangements, is the refusal documented? KAR 28-31-4(g)(4)/40 CFR 265.37(b)</p> | <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> |

Preparedness and Prevention Requirements:
--

☒ **Compliance**
☐ **Non-Compliance**
☐ **NA**

(If Kansas generator, stop here)

Personnel Training (GPT)

YES NO NA V#

- | | | | | |
|-----|---|-------------------------------------|--------------------------|--|
| 37. | Has the generator established a hazardous waste management training program?
KAR 28-31-4(g)(4)/40 CFR 265.16(a)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| a. | Is the program directed by a person trained in hazardous waste management?
KAR 28-31-4(g)(4)/40 CFR 265.16(a)(2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| b. | Are new personnel trained within six months after their employment or placement to a new position? KAR 28-31-4(g)(4)/40 CFR 265.16(b) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| c. | Are new employees supervised until training is completed?
KAR 28-31-4(g)(4)/40 CFR 265.16(b) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| d. | After initial training, are employees trained on an annual basis?
KAR 28-31-4(g)(4)/40 CFR 265.16(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| e. | Does the generator maintain the following documents and records: | | | |
| 1. | Job title for each position related to hazardous waste management and the name of the employee filling each job? KAR 28-31-4(g)(4)/40 CFR 265.16(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 2. | Written job description for each position?
KAR 28-31-4(g)(4)/40 CFR 265.16(d)(2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 3. | Description of type and amount of both introductory and continuing training to be given each person? KAR 28-31-4(g)(4)/40 CFR 265.16(d)(3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 4. | Records of training given to facility personnel?
KAR 28-31-4(g)(4)/40 CFR 265.16(d)(4) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 5. | Are training records kept on all current and past employees?
KAR 28-31-4(g)(4)/40 CFR 265.16(e) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

Personnel Training Requirements:

<input checked="" type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA
--

Contingency Plan (GPT)

	YES	NO	NA	V#
38. Does the generator have a contingency plan? KAR 28-31-4(g)(4)/40 CFR 265.51(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
If yes,				
a. Does the plan list the name(s), home address, and phone number (home and office) of each designated emergency coordinator in the order in which they should be contacted? KAR 28-31-4(g)(4)/40 CFR 265.52(d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
b. Is an emergency coordinator available at all times? KAR 28-31-4(g)(4)/40 CFR 265.55	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? KAR 28-31-4(g)(4)/40 CFR 265.52(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
d. Does the plan describe arrangements made with emergency response agencies? KAR 28-31-4(g)(4)/40 CFR 265.52(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? KAR 28-31-4(g)(4)/40 CFR 265.52(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? KAR 28-31-4(g)(4)/40 CFR 265.52(f)	<input type="checkbox"/>	<input checked="" type="checkbox"/>		3
g. Have copies of the plan been provided to outside emergency response agencies and hospitals? KAR 28-31-4(g)(4)/40 CFR 265.53(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
h. If implementation of the plan has been required at the facility, was the generator required to submit a written report on the incident to the KDHE? KAR 28-31-4(g)(4)/40 CFR 265.56(j)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
1. If yes, was the written report submitted? KAR 28-31-4(g)(4)/40 CFR 265.56(j)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Contingency Plan Requirements:☐ Compliance ☒ Non-Compliance ☐ NA

(if EPA generator, stop here.)

V# = Violation Number

GENLIST09-29-03.wpd: Generator Checklist Revised September 29, 2003

Additional Information and Conclusions:

Other items:

**SUBPART C
USED OIL GENERATOR
COMPLIANCE INSPECTION CHECKLIST**

	Off-Spec Used Oil	On-Spec Used Oil	Oil Filters
Types of Oils: (i.e. motor oil, cooling oil, cutting oil, compressor oil)	motor oil	–	turf equipment
Amount generated per month:	100 gallons	–	5 - 25
Amount received from off-site sources:	none	–	none
Amount presently in storage:	275 gallons	–	~ 10
Accumulation time:	4 - 6 months	–	varies
Present disposal methods:	recycled	–	recycled
Name of UO Transporter	Safety-Kleen 53 rd St. North; Wichita, KS	–	Wichita Iron & Metal Wichita, KS

YES NO NA V#

1. If the generator mixes hazardous waste with used oil without managing the mixture as hazardous waste, does the facility fall under the SQG exemption?
KAR 28-31-4(p)

☐ YES ☐ NO ☒ NA V#

2. If the generator stores used oil on-site:
 - a. Is the storage unit(s) in good condition? **KAR 28-31-16/40 CFR 279.22(a)**

☒ YES ☐ NO ☐ NA
 - b. Is the storage unit(s) free from leaks? **KAR 28-31-16/40 CFR 279.22(b)**

☒ YES ☐ NO ☐ NA
 - c. Is the storage unit(s) and/or fill pipe(s) clearly labeled with the words "USED OIL?" **KAR 28-31-16/40 CFR 279.22(c)** (If storage unit(s) are labeled "Waste Oil", simply make a comment that they should be re-labeled "Used Oil")

☒ YES ☐ NO ☐ NA

3. If there has been a release of Used Oil:
 - a. Was the leak stopped? **KAR 28-31-16/40 CFR 279.22(d)(1)**

☐ YES ☐ NO ☒ NA
 - b. Was the release contained? **KAR 28-31-16/40 CFR 279.22(d)(2)**

☐ YES ☐ NO ☒ NA
 - c. Was the release cleaned-up and managed properly?
KAR 28-31-16/40 CFR 279.22(d)(3)

☐ YES ☐ NO ☒ NA
 - d. If necessary, was the storage unit repaired or replaced?
KAR 28-31-16/40 CFR 279.22(d)(4)

☐ YES ☐ NO ☒ NA

YES NO NA V#

4. If the generator burns used oil on-site:
- a. Does generator burn only used oil that the generator/operator generates or used oil received from household do-it-yourself used oil generators, or used oil from any source that has been determined to be on-spec?
KAR 28-31-16/40 CFR 279.23(a) ☐ ☐ ☒
 - b. Is the space heater designed to have a maximum capacity of not more than 0.5 million Btu per hour? **KAR 28-31-16/40 CFR 279.23(b)** ☐ ☐ ☒
 - c. Are the combustion gases from the space heater vented to the ambient air? **KAR 28-31-16/40 CFR, 279.23(c)** ☐ ☐ ☒
5. If the generator self-transportes used oil to an approved collection site or to an aggregate collection site owned by the generator
- a. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? **KAR 28-31-16/40 CFR 279.24(a)(1) or 40 CFR 279.24(b)(1)** ☐ ☐ ☒
 - b. Does the generator transport no more than 55 gallons of used oil at any time? **KAR 28-31-16/40 CFR 279.24(a)(2) or 40 CFR 279.24(b)(2)** ☐ ☐ ☒

NOTE: IF NO TO QUESTION 5-a OR 5-b, COMPLETE USED OIL TRANSPORTER CHECKLIST.

6. If the generator has their used oil reclaimed under a tolling (contractual) agreement?
- a. Does the tolling (contractual) agreement indicate the type of used oil and the frequency of shipments? **KAR 28-31-16/40 CFR, 279.24(c)(1)** ☐ ☐ ☒
 - b. Is the vehicle used to transport the used oil to the processing/re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor/re-refiner?
KAR 28-31-16/40 CFR, 279.24(c)(2) ☐ ☐ ☒
 - c. Is reclaimed oil returned to the generator? **KAR 28-31-16/40 CFR, 279.24(c)(3)** ☐ ☐ ☒
7. Does the generator use a used oil transporter who is registered in Kansas? ☒ ☐ ☐
Name of Transporter: Safety-Kleen on E 53rd St. North, Wichita, KS

Used Oil Generator Requirements:	<input checked="" type="checkbox"/> Compliance	<input type="checkbox"/> Non-Compliance	<input type="checkbox"/> N/A
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V# = Violation Number

Used Oil Generator 09-29-03.wpd: Checklist Revised September 29, 2003

RCRA Compliance Inspection Summary

Excel Industries, Inc.
200 S. Ridge Road
Hesston, KS 67062-2097

EPA ID Number: KSD 007 237 290

Inspection Dates: January 9, 10, and 12, 2004

KDHE Inspector: Steff Fackrell (BEFS, SCDO)

1.0 INTRODUCTION

On January 9, 10, and 12, 2004 I conducted a routine hazardous waste compliance inspection at Excel Industries, Inc. (facility) to determine compliance with state and federal hazardous waste regulations. On the most recent notification of regulated waste activity, dated February 19, 2003, the facility notified as an EPA Generator.

The facility manufactures industrial and commercial turf and grounds maintenance equipment. The facility currently employs 250 people. Business hours are from 8:00 a.m. to 5:00 p.m., Monday through Friday. Assembly, fabrication, and welding operations are conducted on two shifts, from 6:00 a.m. to 2:30 p.m. and 2:30 p.m. to 11:00 p.m., Monday through Friday. Painting operations are conducted on two shifts, from 6:00 a.m. to 2:30 p.m. and 11:00 p.m. to 6:00 a.m., Monday through Friday.

2.0 PREVIOUS INSPECTIONS

The previous RCRA compliance inspection was conducted on March 17, 18, and 20, 2003 by Steff Fackrell, South Central District Office (SCDO). Three violations were reported in the March 2003 inspection: 1) failure to label one storage container with the words "hazardous waste," 2) failure to mark one storage container with the accumulation start date, and 3) failure to conduct annual personnel training in the years 2001 and 2002. All three violations were corrected.

Seven violations were reported in the September 30, 1998 inspection conducted by Gil Perez, SCDO. The seven violations were: 1) failure to determine drum contents, 2) inaccurate notification, 3) failure to label containers with the words "hazardous waste," 4) failure to mark containers with accumulation start dates, 5) failure to conduct weekly inspections of hazardous waste storage area, 6) failure to develop and implement a training program, and 7) incomplete contingency plan. All seven violations were corrected.

2.1 CHANGES SINCE PREVIOUS INSPECTION

Since the previous inspection by KDHE in March 2003, a powder coating process replaced the former two-stage liquid painting process. Powder coating operations began January 15, 2004. Additionally, a new 10-stage pre-treatment system replaced the former 3-stage parts washer system. The powder coating and pre-treatment systems are located in a newly constructed building, Plant 4.

A 2,100-foot long chain-drive conveyer system moves parts between Plant 1 and Plant 4. In Plant 1, raw metal parts are placed on hooks on the conveyer system. The parts are conveyed to Plant 4 where the parts are pre-treated, painted, baked, and cooled. The parts are then conveyed to Plant 1 where the parts are removed from the conveyer system for assembly.

3.0 INSPECTION

I arrived at the facility at 1:30 p.m. on January 9, 2004 and met with Lee Peters, Facilities Manager. I presented my credentials and explained to Mr. Peters the purpose and procedures of the hazardous waste inspection. The inspection included points of waste generation, storage areas, and a records review of related paperwork and documents.

The facility is comprised of four buildings identified as Plants 1, 2, 3, and 4. A facility site map for Plants 1, 2, and 3 is provided in Attachment 1. A facility site map for Plants 1 and 4 is provided in Attachment 2.

The photographs referenced in this summary are located in the attached appendix.

3.1 Plant 1

Plant 1 consists of the process lines for the manufacturing of the turf and grounds equipment, including machining, tooling/engineering, painting, assembling, and welding areas. The maintenance department is also located in Plant 1.

In the maintenance department I observed three containers of spent fluorescent lamps stored in the original lamp containers. One of the three containers was not labeled. I discussed the labeling and dating requirements for spent fluorescent lamp containers and noted it as comment A on the Notice of Non-compliance (NONC).

The facility stores 5-gallon safety containers of gasoline and diesel fuel in Plant 1. The fuel is for the nurse tanks on the turf and grounds equipment. I observed staining on the metal shelf holding the safety containers and on the concrete floor below the metal shelf. Rick Farnsworth, Production Superintendent, told me that staining was likely caused by overfilled containers. I recommended to Mr. Peters and Mr. Farnsworth that a secondary containment

device, or other spill control device, be installed to contain and minimize any fuel leaks or spills. This was noted as comment D on the NONC.

3.2 Plant 2

Plant 2 consists of the facility warehouse and sales and service department. The warehouse is used for the storage of parts and products for sale, and for shipping and receiving. Although the service department receives equipment for servicing the actual servicing of equipment occurs at Plant 3. No hazardous waste is generated in Plant 2.

3.3 Plant 3

Plant 3, also referred to as the Roundtop, houses the service and prototype engineering departments. The 600-gallon used oil tank was labeled "waste oil." I explained to Mr. Peters that the tank should be relabeled with the words "used oil," and noted it as comment C on the NONC.

3.4 Plant 4

Plant 4 contains the powder coating process line, which consists of a 10-stage pre-treatment system, oven, environmental room for the three powder coating booths, and waste water treatment system (WWTS). Plant 4 is also used for storage of assemble turf and grounds equipment.

The 10 stages of the pre-treatment system are listed in Attachment 3. The concentrates from Stages 1, 3, and 6 gravity flow to Holding Tank 1. The rinses from Stages 2, 4, 5, 7, 8, and 9 gravity flow to Holding Tank 2. Each holding tank has a capacity of 5,000 gallons. A ratio of 1 part concentrates to 4 parts rinses is pumped to the WWTS. The WWTS is described in Attachment 4. The facility's consultant, Rachel Overheul, Chemical Engineer with Integrated Solutions, told me that the treated waste water is discharged to the sanitary sewer under an interim National Pollutant Discharge Elimination System (NPDES) permit. The interim permit, P-LA07-I001, was provided by Steve Casper, KDHE Bureau of Water (BOW). The interim NPDES permit number is the same as the facility's previous NPDES permit number for the former three-stage pre-treatment system. Mr. Peters said that the tanks will be cleaned out as needed. I observed three 55-gallon containers labeled "filter sludge" generated from the WWTS sludge press. A waste determination for the sludge is currently being conducted. Mr. Peters told me that a sample of the filter cake had been sent to Continental Analytical Services (CAS) for analysis.

I observed one 55-gallon container labeled "filter bags" from Stage 1, alkaline clean, of the pre-treatment system. A waste determination for the filter bags is currently being conducted. Mr. Peters told me that a sample of the filter bags had been sent to CAS for analysis.

3.5 Hazardous and Nonhazardous Waste Storage Area

Hazardous and nonhazardous waste were segregated within the waste storage area located outside on the east side of Plant 1.

The six 55-gallon hazardous waste storage containers were each marked with the accumulation start date. Five of the six storage containers contained waste acetone (D001, F003) from the former urethane painting operations, and the sixth storage container contained used gasoline (D001, D018). Two of the hazardous waste acetone storage containers were observed to have been in storage longer than 90 days. The accumulation start dates were 10/25/03 and 11/06/03 (see Photo 1 and 2). **Violation 2**, K.S.A.65-3441(a)(2), was cited for storage of hazardous waste longer than 90 days without a permit or other written approval.

3.6 Records Review

Records reviewed included material safety data sheets (MSDS), manifests from March 2003 through January 2004, land disposal restriction notices (LDRs), contingency plan, personnel training documents, and weekly inspection logs for the hazardous waste storage area from March 17, 2003 through February 9, 2004. Violations cited based on the records review are discussed below.

Hazardous waste storage area weekly inspection logs for the weeks of 3/24/03, 7/28/03, and 12/29/03 were missing. **Violation 1**, K.A.R. 28-31-4(g)(1)(A), was cited for failure to conduct three weekly inspections of hazardous waste storage containers.

The contingency plan did not include an evacuation plan for facility personnel that describes signals and evacuation routes. **Violation 3**, K.A.R. 28/31/4(g)(4)/40 CFR 265.52(f), was cited because the contingency plan did not describe evacuation signals and routes.

I recommended that the facility update the contingency plan to reflect the new building, Plant 4, and new powder coat process operation. This is noted as comment E on the NONC. I also recommended that the facility improve the emergency equipment locations and capabilities listed in the contingency plan. This is noted as comment F on the NONC.

4.0 EXIT BRIEFING

I conducted an exit briefing with Mr. Peters and Ms. Overheul on January 12, 2004. I explained the three violations observed during the inspection and discussed the comments noted on the NONC. I also explained that the facility had 30 days within which to provide KDHE SCDO with written descriptions of the corrective actions addressing the violations. I provided Mr. Peters with copies of the following documents:

- Signed and dated copy of the NONC
- Two copies of the *Hazardous Waste Generator Handbook* (September 2003)

- One copy of the *Kansas Statutes Annotated and Administrative Regulations*, Hazardous Waste Management (August 2002)
- Closed Containers - KDHE Technical Guidance Document (TGD) HW 97-03
- Spent Fluorescent Lamps Containing Mercury - KDHE TGD HW 95-01

5.0 ATTACHMENTS

Attachment 1 - Facility Site Map, Plants 1, 2, and 3
Attachment 2 - Facility Site Map, Plants 1 and 4
Attachment 3 - 10-Stage Pre-treatment System
Attachment 4 - Waste Water Treatment Systems

6.0 APPENDIX

All photographs in the appendix were taken by Steff Fackrell using a Kodak DC5000 digital camera.

7.0 SIGNATURE OF AUTHOR / INSPECTOR

This report was prepared by:

Steff Fackrell
Signature

2/27/04
Date

ATTACHMENT 1

Facility Site Map
Plants 1, 2, and 3

Directions to Plant 2:

North on Ridge Road

East on Randall Street

South on Commerce Drive



.....

Excel Industries, Inc.

.....

200 South Ridge Road

.....

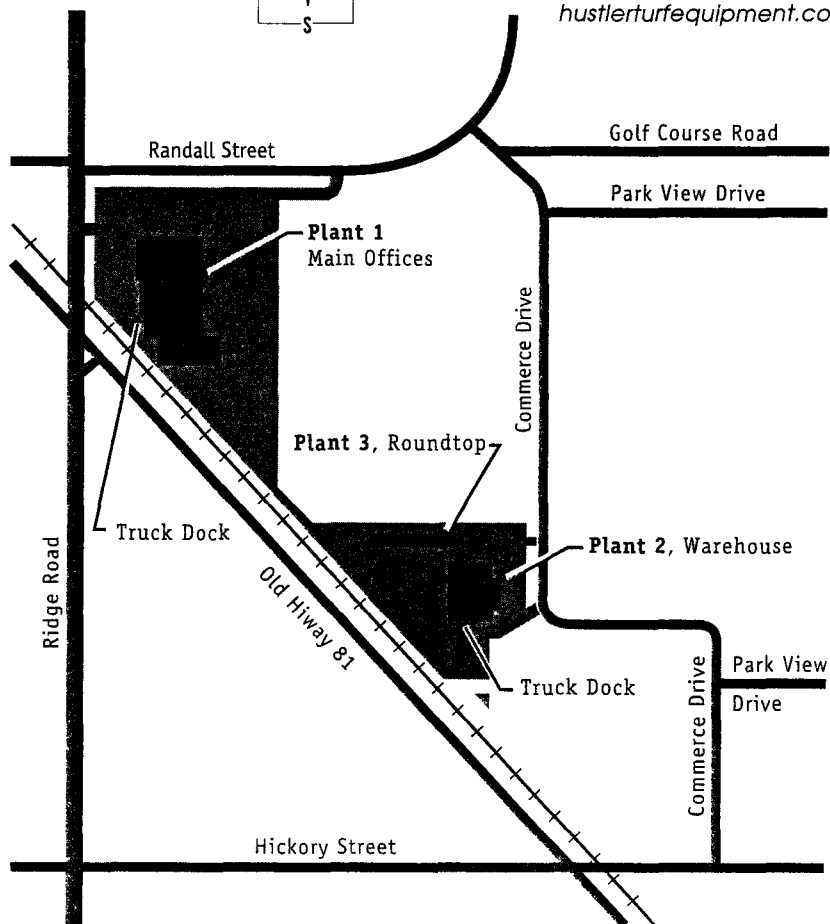
Hesston, KS 67062

...

620-327-4911

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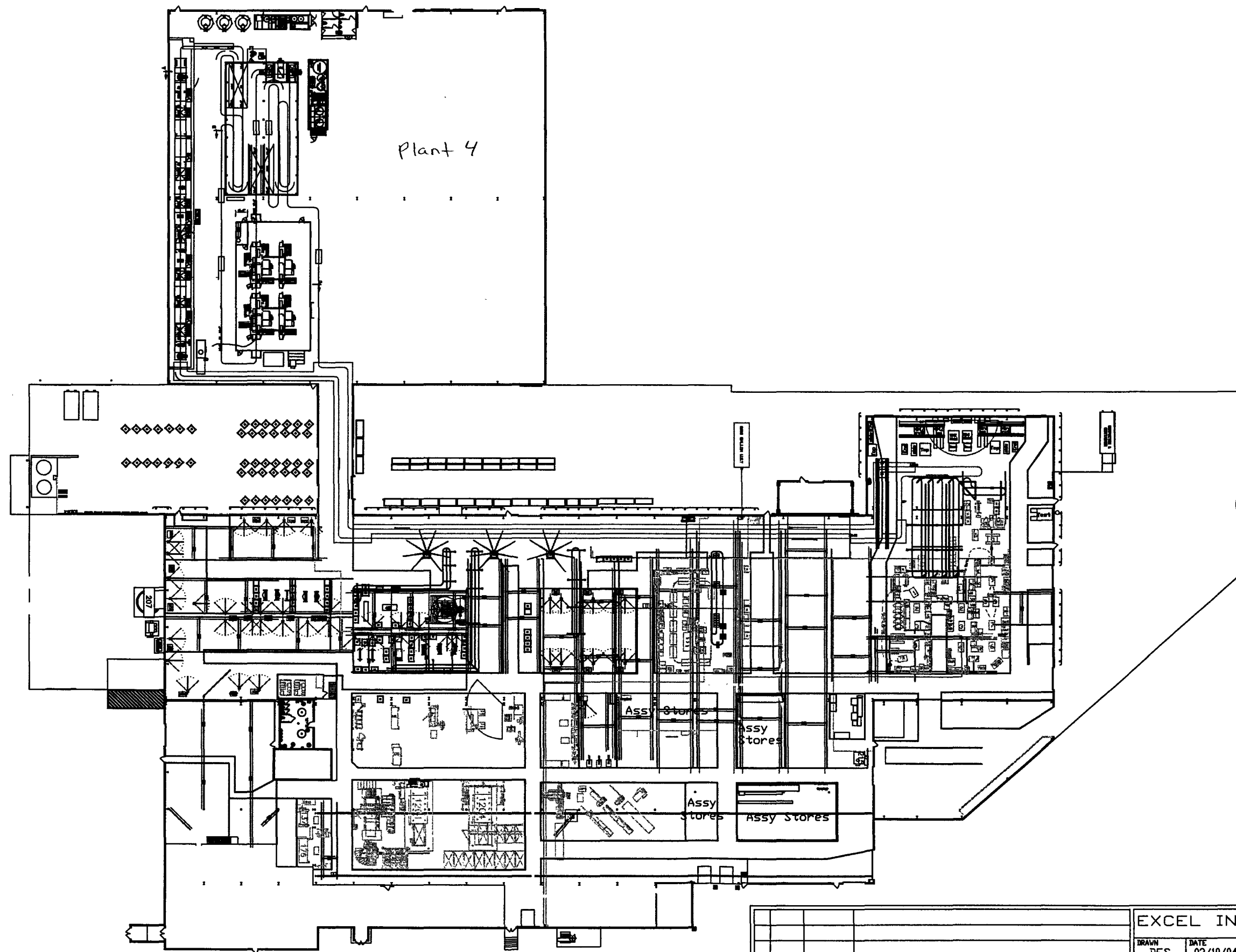
hustlerturfequipment.com



ATTACHMENT 2

Facility Site Map
Plants 1 and 4

2 ←



EXCEL INDUSTRIES INC., HESSTON, KS			
DRAWN DES	DATE 02/10/04	TITLE EXCEL INDUSTRIES	
CHECKED	DATE	NUMBER PLANT LAYOUT	
SCALE		PG 1 OF 1	
LET. BY	DATE	DESCRIPTION	
CHG. LET.	MATERIAL	B	

ATTACHMENT 3

10-Stage Pre-treatment System

Pre-Treatment System

Ten Stages

Stage #1 - Alkaline clean

Stage #2 - Fresh Water Rinse

Stage #3 - Acid Pickle

Stage #4 - Neutralization Rinse

Stage #5 - Fresh Water Rinse

Stage #6 - Iron Phosphate coat

Stage #7 - Fresh Water Rinse

Stage #8 - Non-Chrome Seal

Stage #9 - Reverse Osmosis halo
rinse

Continued

Stage #10 - Moisture blow-off
with air cannons

Housing width 6'-0"

Housing length 155'-0"

Housing height 10'-5", elevated
with 6'-6" clear height with 4'-0"
high tanks

Elevated tunnel for ease of
maintenance

Stages #1, #3, & #6 are heated

Overall height 19'-6"

Gel coated .25" thick fiberglass
construction

Continued

Special chemical resistant
fiberglass fabric in stage #1 & #3

Product profile 36" wide X 60"
tall X 90" long

Process capacity 10,000#/hour

Process speed 3' to 9'/minute

Process overflow up to 20 gpm

Tanks 720 gallons to 1980 gallons

Pump Motors 7.5 H.P. to 30 H.P.

S.S. pumps on Stages #3 to #8

Time per stage 30 to 90 seconds

No. risers 6 to 15/stage

No. nozzles 90 to 225/stage

ATTACHMENT 4

Waste Water Treatment System

Waste Water Treatment System

- Removes all heavy metals from process water
- Treats 16 gallons of rinse water & 4 gallons of chemical solution per minute
- Water quality is monitored & controlled throughout the process by pH probes and controllers

Continued

- Discharge parameters set by the Kansas Department of Health & Environment are met (monitored & controlled by the control panel at all times)
- Designed specifically for Excel Industries

APPENDIX

Photographs

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

Division of Environment

Photo Mounting Sheet

Name of Site: Excel Industries, Inc. 200 S. Ridge Road
(Street)

Location: Hesston Harvey KSD 007 237 290
(City) (County) (ID number)



Picture No. 1

Date: February 10, 2004

Facing: _____

Location: Hazardous Waste
Storage

Photo By: S. Fackrell

Comments Hazardous waste

acetone. Accumulation start

date marked 10/25/03.



Picture No. 2

Date: February 10, 2004

Facing: _____

Location: Hazardous waste
Storage

Photo By: S. Fackrell

Comments Hazardous waste

acetone. Accumulation start

date marked 11/06/03.